

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2012

Docket No. N2012-1

NATIONAL POSTAL POLICY COUNCIL
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DAVID E. WILLIAMS (USPS-T-1) (NPPC/USPS-T1-1-15)
(January 10, 2012)

The National Postal Policy Council ("NPPC"), pursuant to rule 26 of the Commission's rules of practice, respectfully submits the following interrogatories, numbered (NPPC/USPS-T1-1 through 15) to United States Postal Service witness David E. Williams (USPS-T-1) and requests a timely answer under oath. If an interrogatory can be more accurately answered by a different witness, please redirect to the appropriate witness.

Please contact the undersigned with any questions.

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Certificate of Service

I hereby certify that I have this 10th day of January, 2012, caused to be served the foregoing document upon the United States Postal Service and the Public Representative in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker
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NPPC/USPS-T1-1: Assuming that service standards for First-Class Mail are revised as described in your testimony, please describe the measures that the Postal Service would implement to ensure the consistency of three-day mail delivery and to prevent mail subject to that standard from in fact receiving four- or five-day service.

NPPC/USPS-T1-2: Assuming that service standards for First-Class Mail are revised as described in your testimony, does the Postal Service anticipate that any First-Class Mail currently subject to a three-day delivery standard will change to a four-day or longer standard? If so, please describe.

NPPC/USPS-T1-3: Assuming that service standards for First-Class Mail are revised as described in your testimony, what percentage of First-Class Mail does the Postal Service anticipate will be delivered:

- a. In four days?
- b. In five days?
- c. In more than five days?

NPPC/USPS-T1-4: Assuming that service standards for First-Class Mail are revised as described in your testimony, what percentage of First-Class letter mail that currently receives overnight delivery would be expected to receive:

- a. Two-day delivery?
- b. Three-day delivery?

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NPPC/USPS-T1-5: Does the Postal Service intend to maintain a separate processing stream for remittance mail and caller service under the proposal in this proceeding?

NPPC/USPS-T1-6: Please describe the processing and delivery standards that would apply to remittance mail under the proposed service standards for First-Class Mail.

NPPC/USPS-T1-6: Please describe the processing and delivery standards that would apply to Caller Service under the proposed service standards for First-Class Mail.

NPPC/USPS-T1-7: Has the Postal Service made any assumptions regarding whether Presort First-Class Mailers would alter their preparation and entry times if the Critical Entry Times were revised as proposed? If so, please state what assumptions the Postal Service has made. If not, please explain why not.

NPPC/USPS-T1-8: Has the Postal Service made any assumptions regarding what types and amounts of costs Presort First-Class Mailers would incur in altering their preparation and entry times if the Critical Entry Times were revised as proposed? If so, please state what assumptions the Postal Service has made. If not, please explain why not.

NPPC/USPS-T1-9: Is it your understanding that large Presort First-Class Mailers that prepare and mail statements and remittances typically do so on a once-a-month basis, on a rolling, continuous basis, or some combination of both?

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NPPC/USPS-T1-10: Assuming that service standards for First-Class Mail are revised as described in your testimony, would metered mail be eligible for overnight delivery if entered by the 8 a.m. Critical Entry Time? If so, what conditions would metered mail be required to satisfy to attain to be eligible for overnight delivery?

NPPC/USPS-T1-11: Assuming that service standards for First-Class Mail are revised as described in your testimony, would there be any changes from current Critical Entry Times for Presort First-Class Mail that would receive second- or third-day service? If so, please describe those changes.

NPPC/USPS-T1-12: Assuming that the mail processing network is adjusted in a manner generally consistent with the Postal Service's proposal in this proceeding, the Postal Service will have fewer mail processing facilities and fewer transportation routes than at present. Please describe how the Postal Service plans to overcome any potential disruptions to that smaller network that might be caused by natural disasters or Acts of God.

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NPPC/USPS-T1-13: Assume that the Postal Service implements the proposal in this proceeding. What capacity would the Postal Service's network have thereafter to maintain First-Class Mail service standards if First-Class volumes increased by:

- a. 10 percent over current projections by FY2016?
- b. 20 percent over current projections by FY2016?
- c. 30 percent over current projections by FY2016?

NPPC/USPS-T1-14: Assuming that the mail processing network is adjusted in a manner generally consistent with the Postal Service's proposal in this proceeding, the Postal Service will have fewer mail processing facilities than at present. This implies that remaining facilities would, on a per-facility basis, serve more 3-digit and 5-digit zones. Please discuss whether the Postal Service intends to allow mailers to make greater use of 5-digit/3-digit sort schemes in those facilities.

NPPC/USPS-T1-15: Has the Postal Service considered implementing a secure disposal program for Undeliverable As Addressed First-Class letters given the smaller number of mail processing facilities that it expects to have after implementation of the proposal in this proceeding?